

From: [Jonathan Street](#)
To: [Leslie Goff Sanders](#); [Lauren Irwin](#); [Emily](#); [Daniel Crowell](#)
Subject: Re: Ramsey's latest motion
Date: Thursday, January 18, 2024 4:06:47 PM
Attachments: [image001.png](#)

We consider this e-mail exchange a meet and confer for any motion we plan on filing to strike your motion.

We let you know the issue, you refuse to strike your motion despite the issue being raised.

Please let me know if I am incorrect.

I will be glad to discuss with you briefly this sole ssue, however we wont discuss the allegations contained in your motion. The time to do that would have been prior to its filing.

Thanks

Jon

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From: Leslie Goff Sanders <lsanders@bartonesq.com>
Date: Thursday, January 18, 2024 at 3:59 PM
To: Jonathan Street <street@eclaw.com>, Lauren Irwin <lauren@eclaw.com>, Emily <emily@eclaw.com>, Daniel Crowell <dcrowell@bartonesq.com>
Subject: RE: Ramsey's latest motion

No, we aren't going to withdraw because a renewed motion may be deemed untimely. However, to the extent we were required to confer, then we are happy to meet and confer now and consider any proposed resolution. That would fulfill the spirit of the local rule in that we could resolve this before you have to draft a response and before the Court has to decide the issue. Just let me know if you would like to discuss.

Leslie Goff Sanders
Nashville Managing Partner
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From: Jonathan Street <street@eclaw.com>
Sent: Thursday, January 18, 2024 3:22 PM
To: Leslie Goff Sanders <lsanders@bartonesq.com>; Lauren Irwin <lauren@eclaw.com>; Emily <emily@eclaw.com>; Daniel Crowell <dcrowell@bartonesq.com>
Subject: Re: Ramsey's latest motion

The issue is the motion was filed before any meet and confer in violation of local rules.

Are you willing to strike your motion and then refile if necessary after we meet and confer?

Thanks

Jon

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From: Leslie Goff Sanders <lsanders@bartonesq.com>
Sent: Thursday, January 18, 2024 3:18:39 PM
To: Jonathan Street <street@eclaw.com>; Lauren Irwin <lauren@eclaw.com>; Emily <emily@eclaw.com>; Daniel Crowell <dcrowell@bartonesq.com>
Subject: RE: Ramsey's latest motion

Jon – I'm happy to have a meet and confer before your response deadline, and of course, if we are able to reach an agreement on attorneys' fees, we would withdraw our motion. Let me know if you would like to discuss.

Leslie Goff Sanders
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From: Jonathan Street <street@eclaw.com>

Sent: Thursday, January 18, 2024 1:23 PM

To: Leslie Goff Sanders <lsanders@bartonesq.com>; Lauren Irwin <lauren@eclaw.com>; Emily <emily@eclaw.com>; Daniel Crowell <dcrowell@bartonesq.com>

Subject: Ramsey's latest motion

Counsel-

It appears Ramsey's latest motion failed to comply with the Middle District of Tennessee's local rule 7.01 which states:

LR7.01 – MOTIONS

1. (a) Conference with Counsel, Filing, Response and Reply

(1) Conference with Counsel. In cases in which all parties are represented by counsel, all

motions, except motions under Rule 12, 56, 59, or 60, but including discovery motions, must state that counsel for the moving party has conferred with all other counsel, and whether or not the relief requested in the motion is opposed. In those instances where counsel for the moving party is unable to confer with all other counsel, the motion must describe all attempts made to confer with counsel and the results of such attempts.

Please let me know if you will agree to strike your motion until we have had a chance to confer as required by the rule,

Please consider this an attempt to confer with opposing counsel prior to Plaintiff filing a Motion to Strike the aforementioned filing by the Defendant pursuant to LR 7.01.

Thanks

Jon

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